

and/or nominal losses. Defendants directly caused these injuries and are jointly and severally liable for the damages caused.

Plaintiff requests injunctive relief, declaratory relief, compensatory damages, punitive damages, and any other relief that the court shall determine, and/or any relief that will become apparent and appropriate upon the exchange of discovery.

Plaintiff is a pro se litigant and hopes that this complaint will be reviewed liberally with that in mind. Plaintiff has put his best efforts to be clear and identify the causes of action with their relation to each defendant. Plaintiff understands that no one wants to see shotgun pleadings or any type of confusion, as it can be difficult to understand and thus to respond. This complaint should be clear enough, although pretty long. My apologies in advance. Thank you in advance for your understanding.

### **PARTIES**

1) Plaintiff, Aaron Abadi, is an American citizen, and is a citizen of the State of New York. He resides in the City of New York. His address is 82 Nassau Street, Apt. 140, New York, NY 10038.

2) Defendant, American Airlines Group, Inc. is incorporated in the State of Delaware, and headquarters is located at 1 Skyview Drive, Fort Worth, Texas

76155 (817)-963-1234. This is located in Tarrant County, which is under the jurisdiction of the Northern District of Texas. It has significant and consistent business in Amarillo, Texas, through its flights from the Amarillo Airport. Their address there is 10801 Airport Blvd Amarillo, TX 79111.

3) Defendant PJSC AEROFLOT – RUSSIAN AIRLINES DBA AEROFLOT (“Aeroflot”), is a foreign airline with flights to and from the United States. Passengers can book flights to and from Texas, that is then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. Until recently, Aeroflot had a code-sharing arrangement with Delta Airlines. Their United States registered address is 254 SEQUAMS LANE CENTER, WEST ISLIP, NY, UNITED STATES, 11795.

4) Defendants Aerovías de México, S.A. de C.V. DBA Aeromexico Airlines (“Aeromexico”), is a foreign airline with flights to and from the United States. They operate flights out of Dallas Fort Worth Airport, and passengers can book flights with them from Amarillo, which would be serviced by partner airlines, for the part of the journey that this airline doesn’t operate its own planes. Their Texas registered address is 2702 N LOOP W STE 410 HOUSTON, TX 77092-8904. They have a location in the Dallas Fort Worth Airport, Terminal E.

5) Allegiant Air, LLC, (“Allegiant”), is a domestic airline in the United States headquartered in Las Vegas, NV. It is wholly owned by its parent company,

Allegiant Travel Company, incorporated in Nevada. It has flight routes to and from Texas. Its registered address in Texas is 211 E. 7TH STREET SUITE 620 AUSTIN, TX 78701. It has significant and consistent business in Amarillo, Texas, through its flights from the Amarillo Airport. Their address there is 10801 Airport Blvd Amarillo, TX 79111.

6) Defendant Asiana Airlines Inc. (“Asiana”) is a South Korean airline headquartered in Seoul, South Korea. It is a foreign airline with flights to and from the United States. Passengers can book flights to and from Northern Texas airports, that is then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. American Airlines is a partner airline with flights from Amarillo & Dallas. Its USA registered address is at 3530 WILSHIRE BLVD, 1700, LOS ANGELES, CA, UNITED STATES, 90010.

7) Defendant AVIANCA S.A., (“Avianca”), is a foreign airline with flights to and from the United States. Passengers can book flights to and from Texas, that is then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. They have their own operations in Houston Texas that are located at Terminal D at Houston Airport (IAH). Their Texas registered address is 501 THE MAIN BLDG HOUSTON, TX 77032. Their Dallas address is 1639 W. 23rd St. Ste.300 DFW Airport, TX 75261.

8) Defendant Azul Linhas Aéreas Brasileiras S/A (“Azul”), is a Brazilian

carrier based in Barueri, a suburb of São Paulo. It is a foreign airline with flights to and from the United States. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn't operate its own planes. Its USA registered address is at 28 LIBERTY STREET, NEW YORK, NY, 10005. Additionally, Sabre Corporation (NASDAQ: SABR), the leading technology provider to the global travel industry, has signed an agreement with Azul Linhas Aereas Brasileiras to distribute Azul's fares via the Sabre GDS, which is based in Southlake, Texas, not far from Dallas Fort Worth Airport.

9) Defendant Austrian Airlines AG ("Austrian"), is a foreign airline based in Austria. It flies to and from the United States, and passengers can book flights to and from Amarillo, Texas on Austrian's website and they will fly them through partner airlines, for the part of the journey that this airline doesn't operate its own planes. United Airlines is one of their partner airlines. Its U.S. address is c/o LEGAL DEPARTMENT, 1400 RXR PLAZA WEST TOWER, UNIONDALE, NY, UNITED STATES, 11556.

10) Defendant Air Canada is the flag carrier and the largest airline of Canada by fleet size and passengers carried. Air Canada maintains its headquarters in Saint-Laurent, Montreal, Quebec. Air Canada has flights to and from the United States, including to DFW Airport in Texas. Passengers can book flights to and

from Amarillo, Texas on this airline's website and they will fly them through partner airlines, for the part of the journey that this airline doesn't operate its own planes. United Airlines is one of their partner airlines. Its local address in Dallas, Texas is at Terminal E at Dallas Fort Worth Airport (DFW), DFW Airport, TX, 75261.

11) Defendant AIR CHINA LIMITED ("Air China"), is a foreign airline with flights to and from the United States. Passengers can book flights to and from Texas on their website, that is then serviced through partner airlines, for the part of the journey that this airline doesn't operate its own planes. Their Texas registered address is 701 BRAZOS SUITE 1050 AUSTIN, TX 78701. As per their own website, they have two offices in Houston, TX, one at 3800 Buffalo Speedway Suite 405, Houston, TX 77098, and the other at Houston Airport Office Terminal D, George Bush Intercontinental Airport, Houston, TX 77032.

12) Defendant British Airways PLC ("British Air") is a foreign airline based in the United Kingdom. They are based at Waterside Box 365, Harmondsworth, United Kingdom. They have a New York office at 11 West 42<sup>nd</sup> Street, 24<sup>th</sup> Floor, New York, NY 10036. It flies to and from the United States, and passengers can book flights to and from Amarillo, Texas on British Air's website and they will fly them through partner airlines, for the part of the journey that this airline doesn't operate its own planes. American Airlines is one of their partner

airlines. They operate direct flights under their own flag out of Houston, Texas. Their registered address in Northern Texas is, 1999 BRYAN ST., STE. 900 DALLAS, TX 75201.

13) Defendant Cathay Pacific Airways Ltd. (“Cathay Pacific”), more widely known as Cathay Pacific, is the flag carrier of Hong Kong, with its head office and main hub located at Hong Kong International Airport. It has operations in Northern Texas, and its Texas office is located at SUITE 301, 2520 WEST AIRFIELD DRIVE DFW AIRPORT, TX 75261.

14) Defendant China Southern Airlines Company Limited (China Southern”) is an airline headquartered in Baiyun District, Guangzhou, Guangdong Province and is the largest airline in China. It is a foreign airline with flights to and from the United States. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. American Airlines is one of their partner airlines. Their office in New York is at 295 MADISON AVENUE, SUITE 4500, NEW YORK, NY, UNITED STATES, 10017.

15) Defendant Delta Air Lines, Inc. (“Delta”), is one of the major airlines of the United States and a legacy carrier. One of the world’s oldest airlines in operation, Delta is incorporated in Delaware, and headquartered in Atlanta, Georgia. It has operations in DFW Airport in Northern Texas. Its registered

address in Texas is 211 E. 7TH STREET SUITE 620 AUSTIN, TX 78701.

16) Defendant, EL AL ISRAEL AIRLINES LTD. (“ELAL”), is a foreign airline with flights to and from the United States. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. American is one of their partner airlines. They operate codeshare flights to and from Dallas Fort Worth Airport. Its USA office is currently located at New York Sales office Address: 100 Wall Street, 4th floor, New York, NY 10005 Phone (212) 852 0708.

17) Defendant Emirates is an international airline based in Dubai, in the United Arab Emirates that has multiple flights to and from the United States. They have non-stop flights from Dallas to Dubai, UAE. Emirates uses Terminal D at Dallas Fort Worth Airport (DFW). Their Texas address is at 3700 North Terminal Road George Bush Intercontinental Airport, Terminal D, Houston, TX. 77032.

18) Defendant ETIHAD AIRWAYS PJSC DBA ETIHAD AIRWAYS COMPANY (“Etihad”) is an international airline based in Khalifa City A, near Abu Dhabi City, in the United Arab Emirates. Its Texas registered address is 211 E. 7TH STREET, SUITE 620 AUSTIN, TX 78701. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. American is one of their partner airlines. Its Texas operations are located at 3200 E. Airfield Drive

DFW Airport, Texas 75261.

19) Defendant Eva Airways Corporation (“EVA”) is a foreign airline with operations and flights to and from the United States. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. Alaska Airlines is one of their partner airlines. Its registered address in Texas is 1999 BRYAN ST., STE. 900 DALLAS, TX 75201

20) Defendant Finnair OYJ, (“Finnair”), is a foreign airline based in Finland. It flies to and from the United States, and passengers can book flights on their website, to and from Texas through partner airlines, for the part of the journey that this airline doesn’t operate its own planes. It operates direct flights from Dallas Fort Worth Airport. Its U.S. address is 11 W 42ND ST FL 24 NEW YORK, NY 10036-8002.

21) Defendant FRONTIER AIRLINES, INC. (“Frontier”) is a domestic airline in the United States, which is incorporated in and headquartered in Colorado. It has multiple flight routes to and from Northern Texas. Its registered address in Texas is 211 E. 7TH STREET SUITE 620 AUSTIN, TX 78701.

22) Defendant GULF AIR HOLDING B.S.C (“Gulf Air”), is a foreign airline with flights to and from the United States. Passengers can book flights to and from Amarillo, Texas, that are then serviced through partner airlines, for the



part of the journey that this airline doesn't operate its own planes. Their office in Texas is at 3050 Post Oak Blvd, Suite 1320, Houston, TX 77056.

23) Defendant Iberia Líneas Aéreas de España, S.A. Operadora, Sociedad Unipersonal, DBA Iberia Airlines ("Iberia"), is a flagship airline based in Spain with flights to and from the United States. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn't operate its own planes. American Airlines is one of their partner airlines. It maintains a U.S. office at 1 World Way, Los Angeles, CA 90045.

24) Defendant JetBlue Airways Corporation ("JetBlue") is a Delaware corporation, and has its offices in New York City, Utah, and Florida. It has a registered address in Texas at 211 E. 7th Street, Suite 620 Austin, TX 78701. JetBlue is a mostly domestic airline that flies throughout the United States, with many routes to international destinations. Passengers can book flights to and from Northern Texas, that are then serviced through partner airlines, for the part of the journey that this airline doesn't operate its own planes. American Airlines is one of their partner airlines.

25) Defendant Alia – The Royal Jordanian Airlines Company, DBA Royal Jordanian Airlines ("Jordanian") is an international airline based in Jordan with flights to and from the United States. Passengers can book through them

directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes.

American Airlines is one of their partner airlines. Their U.S. office is located at 355 LEXINGTON AVE, Fl.14 New York, NY 10017.

26) Defendant Kenya Airways ("Kenya"), having headquarters in Embakasi, Nairobi Kenya and its USA corporate office address is at Empire State Building, 350 5th Ave, New York, NY 10118, USA. Kenya has direct flights to and from the United States, and passengers can book flights to and from Amarillo, Texas to fly to Kenya and beyond which will in turn fly those passengers through partner airlines, for the part of the journey that this airline doesn't operate its own planes.

27) Defendant KOREAN AIR LINES CO., LTD ("Korean"), is an international airline based in South Korea, with flights to and from the United states. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes. Delta & Alaska Airlines are some of their partner airlines. Its Texas registered address is 2333 S.SERVICE RD. TERMINAL D, UL D17, ROOM 334 DALLAS, TX 75261.

28) Defendant LATAM Airlines Group S.A. ("LATAM") is an airline holding company headquartered in Santiago, Chile. It is considered the largest

airline in Latin America with subsidiaries in Brazil, Colombia, Ecuador, Paraguay and Peru. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes. Delta Airlines is one of their partner airlines. It maintains a U.S. office at Los Angeles International Airport 380 World Way, Los Angeles, California 90045.

29) Defendant Lot Polish Airlines SA ("LOT"), is a foreign airline based in Poland with flights to and from the United States. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes. United Airlines is one of their partner airlines. Their registered address is in New York State at C/O CONDON AND FORSYTH LLP, 7 TIMES SQUARE, SUITE 1800, NEW YORK, NY, UNITED STATES, 10036.

30) Defendant Lufthansa Systems Americas, Inc. ("Lufthansa"), is a foreign airline with operations and flights to and from Germany. Passengers can book through them directly to and from Amarillo, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes. United Airlines is one of their partner airlines. They have their own operations in Houston, TX, including their own direct flights to Germany. Its registered address in Texas is 1999 BRYAN ST., STE. 900 DALLAS, TX 75201.

31) Defendant SOUTHERN AIRWAYS EXPRESS, LLC DBA Mokulele Airlines (“Mokulele”) is a domestic airline incorporated in Delaware, and headquartered in Hawaii. Passengers can book through them directly to and from Amarillo, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. American Airlines is one of their partner airlines. It is located at 355 Hukilike Street, Suite 103 Kahului, HI 96732-2973.

32) Defendant PHILIPPINE AIRLINES (“Philippine”), is a foreign airline with flights to and from the United States. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. Delta & American Airlines are some of their partner airlines. Their USA office is at 5959 West Century Blvd., Suite 600 Los Angeles, CA 90045.

33) Defendant QATAR AIRWAYS Q.C.S.C. DBA QUATAR AIRWAYS Q.C.S.C. CORPORATION (“Qatar”), is an international airline based in Qatar, with flights to and from the United States. Passengers can book through them directly to and from Amarillo, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. American Airlines is one of their partner airlines. They have their own operations in Dallas, TX, including their own direct flights to Qatar. Its Texas

registered address is 211 E. 7TH STREET, SUITE 620 AUSTIN, TX 78701.

34) Defendant Royal Air Maroc, LTD. (Maroc”), is a foreign airline with flights to and from the United States, and passengers can book flights to and from Texas directly through Maroc, which will in turn fly those passengers through partner airlines. American Airlines is one of their partner airlines. Their USA office is at ONE ROCKEFELLER PLAZA, SUITE 1630, NEW YORK, NY, UNITED STATES, 10020.

35) Defendant SCANDINAVIAN AIRLINES OF NORTH AMERICA INC. DBA SAS (“SAS”), is a foreign airline with flights to and from the United States. Passengers can book flights to and from Texas, that is then serviced through partner airlines. Passengers can book through them directly to and from Amarillo, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. United and American Airlines are some of their partner airlines. Their Texas registered address is 206 E. 9TH STREET, SUITE 1300 AUSTIN, TX 78701.

36) Silver Airways LLC, (“Silver”) is a United States regional airline incorporated in Delaware, with its headquarters in Fort Lauderdale–Hollywood International Airport in Broward County, Florida, near Fort Lauderdale. On November 9, 2021, Silver Airways began contract flying for Amazon Air with feeder flights from Albuquerque, New Mexico and Des Moines, Iowa to Amazon's

hub at the Fort Worth Alliance Airport near Fort Worth, Texas. It has substantial business in Texas. Its registered address in Texas is 1999 BRYAN ST SUITE 900 DALLAS, TX 75201.

37) Singapore Airlines (“SIA”) is the flag carrier airline of Singapore with its hub at Singapore Changi Airport. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. JetBlue, United, & Alaska Airlines are some of their partner airlines. Its Texas address is 3870 N Terminal Rd, Houston, TX 77032, United States. It runs flights to and from the United States.

38) Defendant Southwest Airlines Co. (“Southwest”) has a location at 2702 Love Field Dr. # HDQ6TX Dallas, TX 75235-1908, which is under this court’s jurisdiction. It has significant and consistent business in Amarillo, Texas, through its flights from the Amarillo Airport. Their address there is 10801 Airport Blvd Amarillo, TX 79111. Southwest is a mostly domestic airline that flies throughout the United States, with several routes to international destinations. It is incorporated in Texas and headquartered in Dallas, Texas.

39) Defendant SPIRIT AIRLINES, INC. (“Spirit”), is an airline that has multiple operations in Texas, including at the Dallas Fort Worth Airport in Dallas, TX. Its Texas registered address is 211 E. 7TH STREET SUITE 620 AUSTIN,

TX 78701. It is incorporated in the State of Delaware, and headquartered in Florida, at 2800 Executive Way, Miramar, Florida.

40) Defendant Sun Country, Inc. DBA Sun Country Airlines (Sun Country”), is a domestic airline with flights to and from Dallas and other cities. Its registered address is 129 S. IRVING SAN ANGELO, TX 76902. It has operations out of Dallas Fort Worth Airport, in Texas. It is incorporated in and headquartered in Minnesota.

41) Defendant Swiss International Air Lines AG (“Swiss Air”), is a foreign airline with flights to and from the United States. Passengers can book through them directly to and from Amarillo, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. United Airlines is one of their partner airlines. Their Texas registered address is 14694 FM 1050 UTOPIA, TX 78884.

42) Defendant Air Tahiti Nui, (“Air Tahiti”), is a foreign airline with direct flights to and from the United States. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn’t operate its own planes. American Airlines is one of their partner airlines. Its U.S. address is at 5901 WEST CENTURY BLVD. SUITE 1414 LOS ANGELES CA 90045.

43) Defendant TAP Portugal, Inc. (“TAP”), is the airline of Portugal,

headquartered at Lisbon Airport which also serves as its hub. It is a foreign airline with flights to and from the United States. Passengers can book through them directly to and from Dallas, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes.

American, JetBlue, and United Airlines are some of their partner airlines. Their Texas registered address is 263 Lafayette Street, 3rd FL Newark, NJ 07105.

44) Defendant Turkish Airlines, Inc. ("Turkish"), is a foreign airline with flights to and from the United States. Passengers can book through them directly to and from Amarillo, Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes. United Airlines is one of their partner airlines. Their USA office is at 1400 OLD COUNTRY RD STE 304 WESTBURY, NY 11590-5119.

45) Defendant, United Airlines, Inc. (United Airlines") is a domestic and international United States airline, and has a significant and consistent business in Amarillo, Texas, through its flights from the Amarillo Airport. Their address there is 10801 Airport Blvd Amarillo, TX 79111. It is incorporated in Delaware, and headquartered at the Willis Tower in Chicago, Illinois.

46) Fast Colombia S.A.S., DBA Viva Air Colombia ("Viva") and formerly Viva Colombia, is a Colombian low-cost airline based in Rionegro, Antioquia, Colombia. It is a subsidiary of Irelandia Aviation and third largest



airline in the country. They have international flights to and from the United States. You can book flights from their website to and from Dallas Texas, and they will fly them through a partner airline, for the part of the journey that this airline doesn't operate its own planes. Spirit Airlines is one of their partner airlines. Their USA address is C T CORPORATION SYSTEM 1200 SOUTH PINE ISLAND ROAD PLANTATION, FL 33324.

47) Concesionaria Vuela Compañía de Aviación, S.A.B. de C.V. DBA Volaris ("Volaris"), is a Mexican low-cost airline based in Santa Fe, Álvaro Obregón, Mexico City. It has flights to and from the United States. It has operations out of Dallas Fort Worth Airport, in Texas, amongst other business in Texas. Its Texas registered address is 9800 AIRPORT BLVD. SAN ANTONIO, TX 78216.

48) Matthew Roberts ("Roberts") is the Airport Manager for British Air at Washington Dulles Airport and at the Baltimore International Airport. His mailing address is P.O. Box # 17286, Washington, DC 20041. He has identified himself as the Complaints Resolution Officer for British Air. He was instrumental in implementing the alleged discriminatory actions, and he was the one to convey them to the Plaintiff on behalf of his employer, British Air. He is a citizen of the United Kingdom.

49) Defendant, Roy Goldberg ("Goldberg") is an attorney with STINSON

LLP, located at 1775 Pennsylvania Avenue, N.W. Suite 800, Washington, D.C. 20006 (202) 728-3005 Email: roy.goldberg@stinson.com. He represents American Airlines in a case where Plaintiff initially tried to join, but eventually withdrew. In this case, however, he is listed as a defendant. Plaintiff alleges that this defendant advised the airline to discriminate against him. He personally participated in the denying of Plaintiff access to fly, and in treating him differently than non-disabled passengers, and is directly responsible for the injuries that were sustained by Plaintiff. It is upon Plaintiff's information and belief that he is a citizen of the District of Columbia.

50) Defendant Miguel Morel ("Morel") is an attorney with STINSON LLP, located at Wells Fargo Center, 333 SE 2nd Avenue, Suite 2700, Miami, FL 33131. He represented Spirit Airlines in a case where Plaintiff initially tried to join, but eventually withdrew. Plaintiff alleges that this defendant advised the airline to discriminate against him. He personally participated in the denying of Plaintiff access to fly, and in treating him differently than non-disabled passengers, and is directly responsible for the injuries that were sustained by Plaintiff. It is upon Plaintiff's information and belief that he is a citizen of the State of Florida.

51) Defendant Nathalie Simon ("Simon") is an employee of Delta in their Customer Care Department. Her work address is Delta Air Lines, Inc. 1030 Delta Boulevard Atlanta, Ga 30354-1989. She was a participant in the alleged

discriminations and related claims, presumably on behalf of Delta. It is upon Plaintiff's information and belief that she is a citizen of Georgia.

52) Defendant MedAire, Inc. ("Medaire") is a Nevada Corporation that describes itself as a medical advisory group delivering "integrated medical and security solutions for airlines that includes training, equipment, and professional services for crew and passengers beyond the cabin." Its headquarters is at Suite 450, 4722 North 24th St., Phoenix, AZ 85016. It was a participant in many of the airlines' discrimination processes and in the overall conspiracy.

53) Defendant Center for Emergency Medicine of Western Pennsylvania, Inc., DBA STATMD ("Stat-MD") describes itself as providing "Airline Consultation Services" including in-flight emergency consultation as well as fitness-to-fly ground screening. STAT-MD is a nonprofit organization backed by the resources of the University of Pittsburgh Medical Center. Its headquarters is at 200 Lothrop St. #F1301, Pittsburgh, PA 15213, and it is incorporated in Pennsylvania. It was an active participant in many of the airlines' discrimination processes and in the overall conspiracy.

54) Defendant Robert C. Land ("Land"), is the Senior Vice President Government Affairs and Associate General Counsel for JetBlue. His address is at JetBlue 2701 Queens Plaza N. STE 1 Long Island City, NY 11101-4021. He was the person who responded to Plaintiff's Department of Transportation ("DOT")

complaint in a letter, confirming that he cannot fly with JetBlue, due to his disability.

55) Debbie Castleton (“Castleton”) works in customer support for JetBlue. Her address is at JetBlue 2701 Queens Plaza N. STE 1 Long Island City, NY 11101-4021. She was the person who responded to Plaintiff’s request in an email, confirming that he cannot fly with JetBlue, due to his disability. It is upon Plaintiff’s information and belief that she is a citizen of New York.

56) Anita Ayala is the Complaint Resolution Official (“CRO”) for the Customer Relations North America, of Lufthansa. She denied Plaintiff access to fly with the airline, without fulfilling several requirements that are in violation of the Air Carrier Access Act (“ACAA”). Her address is at Lufthansa German Airlines 1400 RXR Plaza West Tower 14th Floor Uniondale, NY 11556. It is upon Plaintiff’s information and belief that she is a citizen of New York.

See also: D.C. v. Heller; District of Columbia v. Heller